

Before the
Federal Communications Commission
Washington, D.C.

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Federal Communications Commission
Office of Secretary

In the Matter of Technical Standards
for Digital Television

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) MM Docket No. 87-268

To: The Commission

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**Comments of the American Foundation for the Blind
December 6, 1996**

For further information, contact

Paul Schroeder
Director, AFB Midwest
National Program Associate in
Technology and Telecommunications
American Foundation for the Blind
401 N. Michigan Avenue, Suite 308
Chicago, IL 60611
312-245-9961

Scott Marshall
Vice President, Governmental Relations
American Foundation for the Blind
Governmental Relations Group
1615 M Street, N.W., Suite 250
Washington, DC 20036
202-457-1498

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We applaud the Commission and the industries involved for their efforts in reaching agreement on Technical Standards for Digital Television (MM Docket No. 87-268). We take this opportunity to urge the Commission to exercise its authority to protect the public interest of people who are blind or visually impaired or who have other disabilities by ensuring that the standard contains a specific requirement to designate audio bandwidth capacity for the purpose of delivering video descriptions. We note that the ATSC recommended standard provides for vision-impaired services (video description) but does not require the designation of audio bandwidth for this important purpose.

The development of digital TV with the accompanying increase in bandwidth for audio signals will provide new opportunities to improve access to video programming through video description to meet the access needs of millions of Americans who are blind or visually impaired or who have other disabilities which limit their ability to process visual information. Video description consists of verbal (audio) descriptions of key visual elements of a video program which are inserted into natural pauses in the program's dialogue, without interfering with the original audio of a program or movie. The narration provides access to critical, and otherwise inaccessible, visual information such as settings, action, gestures, body language scene changes, graphics, subtitles, and costumes.

Unfortunately, development of this important access feature has been hindered by the analog TV standard. Under the current analog delivery methods, video descriptions can be delivered via the Secondary Audio Program (SAP) Channel. Video described programs are now being provided via the SAP for several programs available through the Public Broadcasting System and on some Cable TV programs as well. However, broadcast and cable networks have resisted allocating funding to develop SAP signal delivery because of the impending move to digital TV.

We understand that the new digital TV standard can provide for multiple channels of audio and that services for those who are visually impaired is referenced in the technical standard. However, we also understand that there is no assurance that audio bandwidth will be maintained for use in providing access to video programming for Americans with visual or other disabilities. In order to assure Americans who are blind or visually impaired of equal access to video programming, a consistent, reliable and mandatory audio standard is essential. If video description is subjected to multiple and ill-defined formats, determined through market competition, costs to consumers and providers will be prohibitive and access will be seriously hindered.

In view of the availability of significantly greater bandwidth capacity in the digital standard, reserving a portion of audio bandwidth specifically for the delivery of video descriptions is not economically burdensome on the affected industry. Such a reservation is essential to ensure that accessibility will be built into new and emerging digital transmission modes. Without such a requirement, we fear that bandwidth, which seems so abundant at the dawn of the digital TV age, will quickly be reserved for other purposes and will not be available as a means of providing equal access for people who are blind or who have other disabilities to the abundant information and entertainment available through video programs.

In addition, we urge the Commission to take steps to ensure that manufacturers of digital TV receivers are required to support simultaneous multi-channel audio-decoding capability so descriptions can be delivered separately from a program's main audio. Otherwise, the audio description channel will require greater bandwidth since it will have to include the main program audio as well. This dual decoding capability must be ensured throughout the full line of a manufacturers TV sets, not merely in the "high-end" sets. Access capabilities must not be limited to high-priced equipment. Dual decoding will also make the description process much cheaper because professional audio mixing sessions will not be necessary.